


U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT

TONY R. MOORE, CLERK
BY: 
DEPUTY

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

UNITED STATES OF AMERICA

* CRIMINAL NO. 23-cr-00207

*

VERSUS

* DISTRICT JUDGE HICKS

*

DEMARKES GRANT

* MAGISTRATE JUDGE HORNSBY

ELEMENTS OF OFFENSE CHARGED IN BILL OF INFORMATION

COUNT 1

18 U.S.C. § 1519

(Falsification of Records)

Title 18, United States Code, Section 1519, makes it a crime for anyone to knowingly falsify and make a false entry in a record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of any department or agency of the United States or in relation to and in contemplation of such a matter.

For you to find the defendant guilty of this crime, you must be convinced that the government has proved each of the following beyond a reasonable doubt:


First: That the defendant knowingly falsified or made a false entry in a record, document, or tangible object;

Second: That the defendant acted with the intent to impede, obstruct, or influence the investigation or proper administration of a matter, or in relation to or in contemplation of a matter; and

Third: That the matter was within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

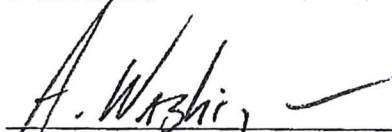
There is no requirement that the matter or investigation have been pending or imminent at the time of the obstruction, but only that the acts were taken in relation to or in contemplation of any such matter or investigation. The government is not required to prove that the defendant specifically knew the matter or investigation was within the jurisdiction of a department or agency of the United States. In other words, the government need not prove that the defendant knew that the matter he was impeding, obstructing, or influencing was federal in nature. A "tangible object" is one used to record or preserve information.

Signed this 30th day of August, 2023.



DEMARKES GRANT

Defendant

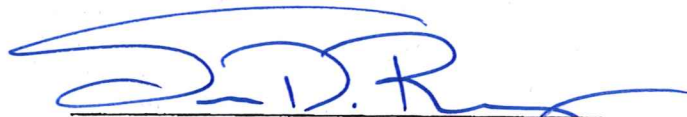


ALEX WASHINGTON

Attorney for the Defendant

BRANDON B. BROWN

United States Attorney

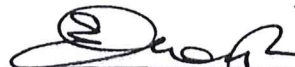


By: SETH D. REEG, La. Bar # 34184

Assistant United States Attorney

KRISTEN CLARKE

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General



By: ERIN MONJU, N.Y. Bar # 5160908

Trial Attorney